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July 27, 2022

Hon. John M. Younge
U.S. Courthouse, Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

Re: Perrong v. Life Corporation, Civil Action No. 21-cv-2188, Joint Motion to Extend Certain Deadlines

Judge Younge:

The parties are writing on this matter to request an extension of time pursuant to this Court's Policies and Procedures: General Matters Civil Cases, and Criminal Cases (available at: <https://www.paed.uscourts.gov/documents/procedures/youpol.pdf>).

In this putative class action alleging violations of the Telephone Consumer Protection Act, the Court entered an Amended Scheduling Order on May 2, 2022 (ECF No. 30). The parties have been actively engaging in discovery since that date, including exchanging discovery responses and multiple document productions. The parties are also in the process of scheduling depositions and have fully briefed two pending motions to compel. (ECF Nos. 22, 28). These motions will significantly impact the contours of the remaining discovery issues in the case.

To allow for discovery to be completed following decisions regarding these motions, the parties propose the following schedule—which involves a four-month extension of the existing deadlines:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Fact Discovery	August 2, 2022	December 1, 2022
Expert Discovery	September 13, 2022	January 12, 2023
Motions for Summary Judgment, Class Certification and Daubert Motions	October 13, 2022	February 2, 2023
Final Pretrial Conference	February 15, 2023 at 10:00 AM	June 15, 2023 at 10:00 AM

Hon. John M. Younge

Re: Perrong v. Life Corporation, Civil Action No. 21-cv-2188, Joint Motion to Extend Certain Deadlines

April 29, 2022

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Please contact our offices if there are any questions.

Sincerely,

Dated: July 27, 2022

Dated: July 27, 2022

s/ Anthony I. Paronich

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